

United States District Court  
Southern District of Texas  
FILED  
*138*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION

DEC 15 2020

*[Signature]* David J. Bradley, Clerk

UNITED STATES OF AMERICA

v.

GIOVANA MARTINEZ  
RODOLFO MARTINEZ  
NORMA JASSMIN HERNANDEZ

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Criminal No. M-20-1900-S1

**SEALED SUPERSEDING INDICTMENT**

**THE GRAND JURY CHARGES:**

**Count One**

From on or about August 12, 2020, through on or about November 6, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**GIOVANA MARTINEZ  
RODOLFO MARTINEZ  
and  
NORMA JASSMIN HERNANDEZ**

did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors, to import into the United States of America from the United Mexican States a controlled substance. The controlled substance involved was five kilograms or more of a mixture or substance containing a detectable amount of cocaine, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, Schedule II controlled substances, and one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 963, 952(a), 960(a)(1), and 960(b)(1).

**Count Two**

On or about October 14, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**GIOVANA MARTINEZ  
and  
RODOLFO MARTINEZ**

did knowingly and intentionally import into the United States of America from the United Mexican States a controlled substance. The controlled substance involved was 500 grams or more, that is, approximately 18.4 kilograms of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 952(a), 960(a)(1), and 960(b)(1) and Title 18, United States Code, Section 2.

**Count Three**

On or about November 6, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**NORMA JASSMIN HERNANDEZ**

did knowingly and intentionally import into the United States of America from the United Mexican States a controlled substance. The controlled substance involved was one kilogram or more, that is, approximately 8 kilograms of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and five kilograms or more, that is, approximately 18.7 kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 952(a), 960(a)(1), and 960(b)(1) and Title 18, United States Code, Section 2.

**Count Four**

On or about August 12, 2020, through on or about November 6, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**GIOVANA MARTINEZ  
RODOLFO MARTINEZ  
and  
NORMA JASSMIN HERNANDEZ**

did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors, to possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, Schedule II controlled substances, and 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

**Count Five**

On or about October 14, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**GIOVANA MARTINEZ  
and  
RODOLFO MARTINEZ**

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 500 grams or more, that is, approximately 18.4 kilograms of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

**Count Six**

On or about November 6, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**NORMA JASSMIN HERNANDEZ**

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was one kilogram or more, that is, approximately 8 kilograms of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and five kilograms or more, that is, approximately 18.7 kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

A TRUE BILL

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FOREPERSON

RYAN K. PATRICK  
UNITED STATES ATTORNEY

Ali Franga  
ASSISTANT UNITED STATES ATTORNEY